

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Cheetah Omni LLC,

Plaintiff,

VS.

Alcatel-Lucent.

Defendant.

HONORABLE TIMOTHY B. DYK

CIVIL ACTION NO. 6:11CV390

JURY TRIAL DEMANDED

**CHEETAH OMNI LLC'S DEPOSITION
DESIGNATIONS**

Plaintiff, Cheetah Omni, LLC ("Cheetah"), files its Deposition Designations. Cheetah reserves the right to identify additional witnesses and designate additional deposition testimony once it has had the opportunity to review Defendant Tellab's Deposition Designations. Cheetah reserves the right to supplement these designations as may be appropriate.

Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:5	4:8		
4:22	4:23		
5:14	5:15		
5:19	5:22		
6:1	6:3		
6:16	6:16		
8:4	8:7		
8:10	8:14		
8:16	8:25		
9:1	9:5		
11:19	11:23		
13:2	13:6		
15:3	15:21		
15:24	15:25		
16:1	16:13		
18:18	18:20		
18:23	18:23		
19:11	19:22		
24:9	24:25		
25:10	25:12		
25:15	25:16		
25:18	25:20		
25:25	25:25		
26:1	26:25		
27:1	27:4		
27:10	27:25		
28:1	28:4		
28:22	28:25		
29:2	29:3		
29:13	29:16		
29:22	29:25		
30:1	30:4		
31:1	31:4		
31:7	31:7		
31:9	31:10		
31:14	31:25		
32:1	32:1		

Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
32:4	32:4		
32:6	32:7		
32:10	32:10		
32:19	32:23		
33:1	33:2		
33:4	33:6		
33:9	33:9		
33:11	33:13		
33:17	33:17		
42:22	42:25		
43:1	43:2		
45:1	45:23		
46:3	46:8		
47:6	47:16		
47:20	47:25		
48:1	48:1		
48:20	48:23		
49:3	49:7		
49:9	49:14		
49:18	49:20		
49:22	49:25		
50:11	50:17		
50:22	50:23		
51:17	51:21		
52:2	52:5		
57:8	57:11		
57:15	57:17		

Jack Kelly, Ph.D. (March 28, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
7:25	7:25		
8:1	8:6		
8:25	8:25		
9:1	9:2		
9:16	9:18		
9:25	9:25		
10:1	10:8		
10:25	10:25		
11:1	11:23		
13:5	13:8		
13:10	13:13		
14:17	14:25		
15:1	15:2		
15:10	15:25		
16:1	16:6		
17:7	17:11		
18:15	18:16		
18:21	18:23		
22:22	22:25		
23:3	23:5		
23:7	23:10		
23:14	23:17		
23:19	23:23		
23:25	23:25		
24:1	24:6		
24:22	24:22		
25:5	25:11		
25:13	25:14		
25:16	25:16		
25:19	25:23		
26:8	26:9		
26:12	26:14		
26:16	26:16		
26:18	26:21		
33:18	33:21		
34:2	34:2		
34:4	34:5		
34:7	34:8		

Jack Kelly, Ph.D. (March 28, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
34:10	34:10		
34:12	34:13		
34:15	34:16		
34:18	34:20		
34:22	34:22		
34:25	34:25		
35:1	35:7		
35:20	35:22		
39:6	39:25		
40:1	40:5		
40:23	40:25		
41:3	41:6		
41:8	41:10		
42:4	42:17		
51:1	51:9		
52:9	52:24		
53:11	53:16		
55:9	55:15		
55:18	55:19		
55:21	55:25		
56:1	56:4		
56:14	56:16		
56:19	56:19		
56:22	56:22		
57:16	57:19		
57:22	57:23		
58:9	58:12		
58:15	58:15		
58:17	58:25		
59:1	59:4		

Kenneth E. Noreen (March 15, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:21	4:23		
6:2	6:13		
6:17	7:10		
11:6	11:11		
16:25	17:2		
23:13	23:15		
23:24	24:24		
25:11	25:13		
25:16	26:5		
31:25	32:2		
38:11	38:14		
38:20	38:24		
40:10	40:21		
40:24	40:25		
41:2	41:3		
41:6	41:8		
41:10	41:12		
41:15	41:22		
50:9	50:10		
50:14	50:16		
50:18	50:20		
50:24	51:2		
73:21	74:10		
75:25	75:25		
76:7	76:8		
86:6	86:7		
95:16	95:19		
96:15	99:1		
104:4	104:7		
104:10	104:12		
104:14	104:17		
104:22	105:1		
105:16	105:23		
106:11	106:13		
106:17	106:23		
114:17	114:25		
115:10	115:24		
116:2	116:3		
116:5	116:8		

Kenneth E. Noreen (March 15, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
116:12	116:17		
117:3	117:5		
117:20	117:23		
118:1	118:6		
118:12	118:13		
118:19	118:21		
118:24	118:25		
119:2	119:3		
119:7	119:12		
120:4	120:7		
120:12	121:1		
121:3	121:4		
121:9	121:18		
121:20	121:21		
122:2	122:2		
122:4	122:4		
122:7	122:8		
127:15	128:17		
150:20	150:23		
150:25	151:1		
151:5	151:7		

Robert T. Ridsen, Jr. (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:21	4:23		
5:12	6:9		
7:6	7:23		
10:6	10:15		
10:24	11:6		
11:25	12:15		
19:4	19:6		
19:14	20:25		
21:3	21:4		
21:22	22:5		
22:9	22:9		
26:23	27:10		
27:13	27:16		
27:18	27:21		
28:11	28:13		
31:2	31:4		
31:15	32:1		
32:9	32:10		
32:14	32:19		
32:21	33:9		
33:13	33:13		
33:20	33:21		
33:23	34:2		
34:5	34:5		
34:7	34:16		
34:19	34:19		
34:21	34:22		
34:25	34:25		
39:16	40:20		
42:9	43:4		
43:8	43:10		
43:12	43:21		
44:5	44:7		
44:11	44:12		
44:14	44:14		
44:17	45:3		
45:5	45:9		
45:13	45:21		

Thomas A. Strasser (October 30, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
7:7	7:10		
9:21	9:25		
10:1	10:5		
23:9	23:25		
24:2	24:2		
24:4	24:8		
40:1	40:9		
43:10	43:25		
44:1	44:5		
45:14	45:15		
45:17	45:18		
46:17	46:19		
46:22	46:25		
47:1	47:1		
47:4	47:7		
47:12	47:14		
47:16	47:18		
48:11	48:12		
48:15	48:17		
66:12	66:16		
66:18	66:22		

Yajun Wang (August 9, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
5:24	6:5		
10:10	10:13		
14:3	14:16		
14:24	14:24		
21:10	21:18		
22:17	23:2		
28:23	29:5		
29:10	29:11		
29:13	29:17		
29:22	29:24		
30:15	30:17		
30:21	30:22		
39:12	39:22		
39:24	40:8		
42:3:	42:13		
42:20	43:5		
53:9	53:14		
83:17	85:12		
85:16	85:18		
88:3	88:6		
83:11	83:14		
89:14	89:18		
93:8	93:14		
96:9	96:11		
96:16	96:18		
97:10	97:13		
97:18	97:23		
98:1	98:3		
98:8	98:10		
98:12	98:13		
98:18	98:19		
98:21	98:21		
98:23	98:24		
99:2	99:2		
99:4	99:5		
99:23	99:25		
100:2	100:5		

Respectfully submitted,

BROOKS KUSHMAN P.C.

Dated: 1/16/2014

By: /s/ Thomas A. Lewry
Thomas A. Lewry (MI Bar No. P36399)
(Lead Attorney)
John S. Le Roy (MI Bar No. P61964)
Robert C.J. Tuttle (MI Bar No. P25222)
John M. Halan (MI Bar No. P37616)
Christopher C. Smith (MI Bar No. P73936)
Brooks Kushman P.C.
1000 Town Center, 22nd Floor
Southfield, Michigan 48075-1238
Tel: (248) 358-4400 – Fax: (248) 358-3351
Email: tlewry@brookskushman.com
jleroy@brookskushman.com
rtuttle@brookskushman.com
jhalan@brookskushman.com
csmith@brookskushman.com

T. John Ward, Jr. (TX State Bar No. 00794818)
Jack Wesley Hill
Ward & Smith Law Firm
1127 Judson Road, Suite 220
PO Box 1231
Longview, Texas 75606
Tel: (903) 757-6400 – Fax: (903) 757-2323
Email: jw@jwfirm.com
wh@jwfirm.com

Eric Miller Albritton
Albritton Law Firm
PO Box 2649
111 West Tyler, 75601
Longview, TX 75606
Tel: (903) 757-8449 – Fax: (903) 758-7397
ema@emafirm.com

Attorneys for Plaintiff

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this the 16th January 2014.

By: /s/ Thomas A. Lewry
Thomas A. Lewry (MI Bar No. P36399)
(Lead Attorney)
John S. Le Roy (MI Bar No. P61964)
Robert C.J. Tuttle (MI Bar No. P25222)
John M. Halan (MI Bar No. P37616)
Christopher C. Smith (MI Bar No. P73936)
Brooks Kushman P.C.
1000 Town Center, 22nd Floor
Southfield, Michigan 48075-1238
Tel: (248) 358-4400 – Fax: (248) 358-3351
Email: tlewry@brookskushman.com
jleroy@brookskushman.com
rtuttle@brookskushman.com
jhalan@brookskushman.com
csmith@brookskushman.com

Attorneys for Plaintiff